



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

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MAA/LB/CJN  
F. #2017R05903

*271 Cadman Plaza East  
Brooklyn, New York 11201*

April 2, 2024

**By Email and ECF**

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Re: United States v. Huawei Technologies Co., Ltd., et al.  
Criminal Docket No. 18-457 (S-3) (AMD)

Dear Counsel:

Enclosed please find the government's production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery supplements the government's previous productions. The discovery is being produced pursuant to the Protective Order entered by the Court on June 10, 2019 ("the Protective Order"). See ECF Docket Entry No. 57. The government also requests reciprocal discovery from the defendants.

I. The Government's Discovery

| <b>Document Description</b>                 | <b>Category of Discovery Pursuant to Protective Order</b> | <b>Bates Range</b>                                |
|---|---|---|
| Records regarding Company 6.                | Sensitive Discovery Material (“SDM”)                      | DOJ_HUAWEI_A_0122441739 – DOJ_HUAWEI_A_0123056264 |
| Records regarding a former Huawei employee. | SDM   | DOJ_HUAWEI_A_0123056265 – DOJ_HUAWEI_A_0123056450 |
| Records regarding Company 6.                | Discovery Material (“DM”)                                 | DOJ_HUAWEI_A_0123056451 – DOJ_HUAWEI_A_0123162173 |
| Records regarding a former Huawei employee. | DM  | DOJ_HUAWEI_A_0123162174 – DOJ_HUAWEI_A_0123163359 |

Very truly yours,

BREON PEACE  
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